

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

JUSTIN LUFT, *et al.*,

Plaintiffs,

v.

Case No. 3:20-cv-00768-JDP

TONY EVERS, Governor of Wisconsin,
et al.,

Defendants; and

THE WISCONSIN LEGISLATURE,

Proposed Intervenor-
Defendant.

**THE WISCONSIN LEGISLATURE’S PROPOSED ANSWER TO
PLAINTIFFS’ FIRST AMENDED COMPLAINT AND
SUPPLEMENTAL COMPLAINTS**

Proposed Intervenor-Defendant the Wisconsin Legislature (“Legislature”) submits this Answer to Plaintiffs’ First Amended Complaint for Declaratory and Injunctive Relief (“First Amended Complaint”) and the Supplemental Complaints filed on July 26, 2016 (“First Supplemental Complaint”) and November 10, 2016 (“Second Supplemental Complaint”) by Plaintiffs Ruthelle Frank, Shirley Brown, Nancy Lea Wilde, Eddie Lee Holloway, Jr., Mariannis Ginorio, Frank Ybarra, Sam Bulmer, Pamela Dukes, Carl Ellis, Rickie Lamont Harmon, Dartric Davis, Barbara Oden, Dewayne Smith, Sandra Jashinski, Justin Luft, Anna Shea, Matthew Dearing, Max Kligman, Samantha Meszaros, Steve Kvasnicka, Sarah Lahti, Domonique

Whitehurst, Edward Hogan, and Anthony Judd, and Anthony Sharp (collectively, the “*Luft* Plaintiffs”),¹ as follows:

I. FIRST AMENDED COMPLAINT

Unnumbered paragraphs on pages 1 through 3 of the *Luft* Plaintiffs’ First Amended Complaint: The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

NATURE OF THE ACTION

1. Admitted.
2. The Legislature admits the first two sentences of this paragraph and deny the remaining allegations in this paragraph.

PARTIES

3. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in the first sentence of this paragraph. The remainder of this paragraph contains no factual allegations to which a responsive pleading is required. To the extent the allegations in this paragraph misstate the law or constitute factual allegations to which a response is required, the Legislature denies the allegations in this paragraph.

4. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

¹ The *Luft* Plaintiffs’ First Amended Complaint was filed over 8 years ago, and some individual Plaintiffs’ claims have been dropped over the course of this litigation.

5. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

6. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

7. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

8. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

9. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

10. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

11. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

12. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

13. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

14. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

15. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

16. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

17. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

18. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

19. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

20. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

21. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

22. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

23. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

24. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

25. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

26. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

27. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

28. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

29. The Legislature admits that at the time of the filing of this complaint, Scott Walker was the Governor of the State of Wisconsin, and otherwise denies the allegations in this paragraph.

30. The Legislature admits that at the time of the filing of this complaint, Judge David G. Deininger was the Chair of the Wisconsin Government Accountability Board (“GAB”); Judge Michael Brennan was the Vice Chair of the GAB; and Judge Gerald C. Nichol, Judge Thomas Barland, and Judge Thomas Cane were the three remaining members of the GAB; and that there was only one vacant seat, and otherwise denies the allegations in this paragraph.

31. The Legislature admits that at the time of the filing of this complaint, Kevin J. Kennedy was the Director and General Counsel of the GAB, and Nathaniel E. Robinson was the Administrator of the Elections Division of the GAB, and otherwise denies the allegations in this paragraph.

32. The Legislature admits that at the time of the filing of this complaint, Mark Gottlieb was the Secretary of the Wisconsin Department of Transportation (WisDOT), which includes the DMV, and otherwise denies the allegations in this paragraph.

33. The Legislature admits that at the time of the filing of this complaint, Lynn Judd was the Administrator of the Wisconsin DMV, and otherwise denies the allegations in this paragraph.

34. The Legislature admits that at the time of the filing of this complaint, Kristina Boardman was the Director of the Bureau of Field Services at the Wisconsin DMV, and otherwise denies the allegations in this paragraph.

35. The Legislature admits that at the time of the filing of this complaint, Donald D. Reincke and Tracy Jo Howard were, respectively, the Region Manager and Region Operational Manager of the DMV Bureau of Field Services for the Southwest Region; Sandra M. Brisco and Barney L. Hall were, respectively, the Region Manager and Region Operational Manager of the DMV Bureau of Field Services office for the Southwest Region; Donald J. Genin was the Region Manager of the DMV Bureau of Field Services for the Northwest Region; Jill Louise Geoffroy was the Region Manager of the DMV Bureau of Field Services office for the North Central Region; Patricia A. Nelson was the Region Manager of the DMV Bureau of Field Services office for the Northwest Region; and that the Bureau of Field Services is the entity within the DMV responsible for issuing driver's licenses and identification cards, and otherwise denies the allegations in this paragraph.

JURISDICTION AND VENUE

36. Admitted.

37. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

FACTS RELATED TO THE PHOTO ID LAW

38. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

39. The Legislature admits the allegations in the first sentence of this paragraph. The remainder of this paragraph contains no factual allegations to which a responsive pleading is required. To the extent the allegations in this paragraph misstate the law or constitute factual allegations to which a response is required, the Legislature denies the allegations in this paragraph.

40. Denied. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

41. Denied. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

42. Denied. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

43. Denied. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the

extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

44. Denied. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

45. Denied. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

46. The Legislature admits the factual allegations contained in this paragraph. To the extent this paragraph contains legal conclusions, no responsive pleading is required. To the extent that allegations misstate the law, the Legislature denies those allegations.

47. Denied. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

48. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

49. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

50. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

51. Denied. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

52. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

53. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

54. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

55. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

56. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

57. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

58. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

**FACTS RELATED TO OBTAINING WISCONSIN PHOTO ID AND THE
UNDERLYING DOCUMENTS REQUIRED BY WISCONSIN DMV**

59. Denied. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph

60. Denied.

61. Admitted.

62. The Legislature admits that at the time of the filing of this complaint, only one DMV office in Wisconsin had weekend hours, and the Madison Odana Renewal Center only processed renewal license and ID card applications. The Legislature lacks knowledge or information sufficient to form a belief as to the remainder of this paragraph.

63. The Legislature admits that at the time of the filing of this complaint, no DMV office in Wisconsin offered hours later than 5:30 p.m. The Legislature lacks knowledge or information sufficient to form a belief as to the remainder of this paragraph.

64. Legislature admits that at the time of the filing of this complaint, not all DMV offices were open full-time and some were open only 20 hours a week. The Legislature lacks knowledge or information sufficient to form a belief as to the remainder of this paragraph.

65. Legislature admits that at the time of the filing of this complaint, WisDOT had no plans to establish and deploy mobile DMV units capable of servicing

voters who live far from a DMV office and/or otherwise have difficulty travelling to a DMV office to obtain a state ID card for voting purposes. The Legislature lacks knowledge or information sufficient to form a belief as to the remainder of this paragraph.

66. Denied. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

67. Denied. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

68. Denied. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

69. Denied. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

70. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

71. Denied.

72. Denied. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

73. Denied. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

74. Denied. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

75. Denied. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

76. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

77. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

78. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

79. The first sentence in this paragraph contains no factual allegations and instead only contains legal conclusions to which no responsive pleading is required. To the extent allegations in the first sentence misstate the law or constitute factual allegations, the Legislature denies those allegations. The Legislature lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

80. Denied.

81. Denied.

82. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

83. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

84. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

85. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

86. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

87. The first through fourth sentences in this paragraph contains no factual allegations and instead only contains legal conclusions to which no responsive

pleading is required. To the extent allegations in the first through fourth sentences misstate the law or constitute factual allegations, the Legislature denies those allegations. The Legislature lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

88. Denied. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

89. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

90. Denied. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

91. Denied. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

92. The Legislature admits the allegations in the first two sentences of this paragraph and denies the remaining allegations in this paragraph.

93. The Legislature admits the allegations in the first three sentences of this paragraph and denies the remaining allegations in this paragraph.

**THE PHOTO ID LAW'S IMPACT ON RACIAL MINORITIES IN
MILWAUKEE COUNTY, WISCONSIN AND THE STATE OF WISCONSIN**

94. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

95. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

96. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

97. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

98. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

99. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

100. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

101. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

102. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

103. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

104. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

105. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

PLAINTIFF CLASS ALLEGATIONS

CLASS 1

106. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

107. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

108. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

109. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

CLASS 2

110. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

111. Denied.

112. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

113. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

114. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

CLASS 3

115. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

116. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

117. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

118. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

119. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

CLASS 4

120. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

121. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

122. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

CLASS 5

123. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

124. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

125. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

CLASS 6

126. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

127. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

128. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

CLASS 7

129. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

130. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

131. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

132. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

CLAIMS

COUNT 1: Violation of the Fourteenth Amendment [Class 1]

133. The Legislature hereby incorporates its response to paragraphs 1 through 109 as if set forth herein.

134. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

135. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

136. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

137. Denied.

COUNT TWO: Violation of the Fourteenth Amendment [Class 2]

138. The Legislature hereby incorporates its response to paragraphs 1 through 105 and 110 through 114 as if set forth herein.

139. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

140. Denied.

141. Denied.

142. Denied.

COUNT THREE: Violation of the Twenty-Fourth Amendment and Equal Protection Clause of the Fourteenth Amendment [Class 3]

143. The Legislature hereby incorporates its response to paragraphs 1 through 105 and 115 through 119 as if set forth herein.

144. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

145. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

146. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

147. Denied.

148. Denied.

COUNT FOUR: Violation of the Equal Protection Clause of the Fourteenth Amendment [Class 4]

149. The Legislature hereby incorporates its response to paragraphs 1 through 105 and 120 through 122 as if set forth herein.

150. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

151. Denied.

152. Denied.

153. Denied.

COUNT FIVE: Violation of the Equal Protection Clause of the Fourteenth Amendment [Class 5]

154. The Legislature hereby incorporates its response to paragraphs 1 through 105 and 123 through 125 as if set forth herein.

155. Denied.

156. Denied.

COUNT SIX: Violation of the Equal Protection Clause of the Fourteenth Amendment [Class 6]

157. The Legislature hereby incorporates its response to paragraphs 1 through 105 and 126 through 128 as if set forth herein.

158. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

159. Admitted.

160. Denied.

161. Denied.

162. Denied.

**COUNT SEVEN: Violation of the Equal Protection Clause of the
Fourteenth Amendment**

163. The Legislature hereby incorporates its response to paragraphs 1 through 105 and 129 through 132 as if set forth herein.

164. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

165. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

166. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

167. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

168. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

169. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

170. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

171. Denied.

COUNT EIGHT: Violation of the Due Process Clause of the Fourteenth Amendment

172. The Legislature hereby incorporates its response to paragraphs 1 through 105 and 163 through 171 as if set forth herein.

173. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

174. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

175. Denied.

176. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

177. Denied.

178. Denied.

179. Denied.

180. Denied.

181. Denied.

COUNT NINE: Vote Denial in Violation of Section 2 of the Voting Rights Act, 42 U.S.C. § 1973 [Class 7]

182. The Legislature hereby incorporates its response to paragraphs 1 through 105 and 129 through 132 as if set forth herein.

183. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

184. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

185. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

186. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

187. Denied.

COUNT TEN: Vote Dilution in Violation of Section 2 of the Voting Rights Act, 42 U.S.C. § 1973 [Class 7]

188. The Legislature hereby incorporates its response to paragraphs 1 through 105 and 129 through 132 as if set forth herein.

189. This paragraph contains no factual allegations and instead contains only legal conclusions to which no responsive pleading is required. To the extent allegations in this paragraph misstate the law or constitute factual allegations, the Legislature denies the allegations in this paragraph.

190. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

191. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

192. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

193. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

194. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

195. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

RESPONSE TO PRAYER FOR RELIEF

The Legislature denies that the *Luft* Plaintiffs are entitled to the relief they have requested.

II. FIRST SUPPLEMENTAL COMPLAINT

The Legislature responds to *Luft* Plaintiffs' First Supplemental Complaint, filed on July 26, 2016 (Dkt. Number 303) as follows:

1. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

2. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph

3. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph

4. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph

5. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph

III. SECOND SUPPLEMENTAL COMPLAINT

The Legislature responds to *Luft* Plaintiffs' Second Supplemental Complaint, filed on November 10, 2016 (Dkt. Number 326) as follows:

1. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

2. The Legislature lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

Dated this 21st day of September, 2020.

Respectfully submitted,

/s/ Scott A. Keller
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